

In the United States District Court  
For the Northern District of Texas  
Dallas Division

|                            |   |                       |
|----------------------------|---|-----------------------|
| John T. Lamont and Preston | § |                       |
| Poulter                    | § |                       |
| Plaintiffs                 | § |                       |
|                            | § | No. 3:21-cv-1176-K-BN |
| v.                         | § |                       |
|                            | § |                       |
| Dean Assaf et al.          | § |                       |
| Defendants                 | § |                       |

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**Plaintiffs' Witness List**

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Pursuant to Local Civil Rule 16.4 and the Court's Scheduling Order of May 30, 2023 (Dkt. 61), the parties submit the following Witness List:

**Witness List**

**A. Probable Witnesses**

- Preston Poulter, c/o Jeremy M. Masten, P.O. Box 541411, Houston, Texas 77254; (254) 307-9185. Mr. Poulter is a plaintiff in this matter and will testify about the facts and circumstances underlying his claims and damages.
- John T. Lamont, c/o Jeremy M. Masten, P.O. Box 541411, Houston, Texas 77254; (254) 307-9185. Mr. Lamont is a plaintiff in this matter and will testify about the facts and circumstances underlying his claims and damages.
- Dean Assaf, 1014 East Alameda Street Manteca, California 95336, (415) 450-5212. Mr. Assaf is the defendant in this matter and will testify about the statements he made.

**B. Possible Witnesses**

- Ethan Van Sciver, c/o Scott Houtteman, 10560 Main Street, Suite 420,

Fairfax, Virginia 22020

- Victoria Kundert, 101 East Main Street, Wallace, North Carolina 28466
- Any witnesses listed on any other party's witness list

**C. Expert Witnesses**

- Jeffrey C. Siegel, Ph.D., ABPP, Forensic and Clinical Psychology, 17330 Preston Rd., Ste. 110B, Dallas, Texas 75252; (972) 960-1472. Provided counseling and therapy services to Preston Poulter.
- Richard M. Santoro, 5006 Wellington Avenue, Box 2701, Ventnor City, New Jersey 08406. Security consultant.
- Michael Dattolo, Web Presence, LLC, d/b/a NetReputation.com, 1100 N Tuttle Ave, Ste 12 Sarasota, Florida 34237. Internet reputation management vendor.

**D. Records Custodian Witnesses**

- YouTube, subsidiary of Google LLC, Corporation Service Company dba CSC - Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701
- Kickstarter, PBC, c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801
- Twitter Inc., 1355 Market Street, San Francisco, California 94103
- KiwiFarms.net

Respectfully submitted,

/s/ Jeremy M. Masten  
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Counsel for Plaintiffs

### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served on all parties through the Court's CM/ECF system, including those listed below, on August 14, 2023.

Dean Assaf  
Aliassaf959@gmail.com

Pro se defendant

/s/ Jeremy M. Masten  
Jeremy M. Masten